

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

DR. SHIVA AYYADURAI,

Plaintiff,

v.

WILLIAMS FRANCIS GALVIN, MICHELLE)
K. TASSINARI, DEBRA O'MALLEY, AMY)
COHEN, NATIONAL ASSOCIATION OF)
STATE ELECTION DIRECTORS, allegedly)
in their individual capacities, and WILLIAM)
FRANCIS GALVIN, in his official capacity as)
Secretary of State for Massachusetts.)

Defendants.

Civ. No. 20-cv-11889

**MOTION FOR LEAVE TO FILE REPLY
IN SUPPORT OF INDIVIDUAL DEFENDANT AMY COHEN'S
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

Pursuant to Local Rule 7.1(b)(3), individual Defendant Amy Cohen hereby seeks leave to file a Reply to respond to certain inaccurate contentions and misstatements in Plaintiff's *pro se* Opposition [Dkt. No. Dkt. No. 47] to her Motion to Dismiss for lack of Personal Jurisdiction under Federal Rule of Civil Procedure 12(b)(2) [Dkt No. 44].

Ms. Cohen requests the opportunity to address Plaintiff's misplaced and erroneous contention, made for the first time in his Opposition, that provisions of RICO, 18 U.S.C. § 1965(b), permit the Court to disregard Ms. Cohen's normal due process rights and exercise jurisdiction over her person, and to explain why the mischaracterizations and assertions in the Opposition do not and can never satisfy Plaintiff's jurisdictional burden. Ms. Cohen's proposed Reply is attached as Exhibit A and is five (5) substantive pages long.

WHEREFORE, Ms. Cohen respectfully requests that the Court grant this motion for leave to file the attached Reply.

Dated: February 1, 2021

Respectfully submitted,

For Amy Cohen

/s/ Nolan J. Mitchell

Nolan J. Mitchell (BBO #668145)

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LOCAL RULE 7.1 CERTIFICATION

I hereby certify that on January 29, 2021, I contacted Plaintiff in good faith in an attempt to narrow or resolve the issues raised by this motion, but the parties were unable to do so.

Dated: February 1, 2021

/s/ Nolan J. Mitchell

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 1st day of February, 2021, a true and correct copy of this document was served on plaintiff and all registered counsel of record via the Court's ECF system.

/s/ Nolan J. Mitchell

Nolan J. Mitchell